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6 KEYBANK LAW GROUP
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Lower Level
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10 Attorneys for KeyBank National Association
11

12 IN THE UNITED STATES BANKRUPTCY COURT
13 FOR THE DISTRICT OF OREGON

14 In re: Chapter 11
15 Laura Lee Hagenauer, No. 14-63530-fra11
16 Debtor. **DECLARATION OF CRAIG G. RUSSILLO**
17 **UNDER LBR 2016(h)(1)(A)(ii)**
18
19

20 I, Craig G. Russillo, hereby declare and state that the following is true to the best of my
21 knowledge, information and belief:

22 1. I am a Shareholder at Schwabe, Williamson & Wyatt, P.C. ("SWW"), attorneys
23 for KeyBank National Association ("KeyBank"), in connection with this case.

24 2. I submit this declaration in support of KeyBank's request for post-petition
25 attorney fees and costs, under LBR 2016-1(h) and 2016-1(h)(1)(C)(ii)(II), payable from the
26 proceeds of collateral.

1 3. On behalf of KeyBank, I request allowance of compensation for professional
2 services of \$42,063.73 and expenses of \$210.80 incurred post-petition on this case, for a total of
3 \$42,274.53. Expenses claimed were actually charged to KeyBank.

4 4. The rate of compensation, number of hours, and requested fee for each person
5 included in this application are summarized as follows:

Name	Title	Rate per hour	Hours	Requested Fee (80% of total)
Alex Poust	Shareholder	\$410.00	.20	\$65.60
Craig G Russillo	Shareholder	\$336.20	96.30	\$25,900.84
Craig G Russillo	Shareholder	\$275.00	.20	\$44.00
Brianne L Bridegum	Associate	\$188.60	1.10	\$165.96
David A Anderson	Associate	\$213.20	10.10	\$1,722.65
David Cutler	Paralegal	\$145.00	3.20	\$371.20
Kai Davies	Paralegal	\$145.00	34.50	\$4,002.00
Karen L Harris	Paralegal	\$192.70	62.60	\$9,650.41
MaryAnn Ivie	Paralegal	\$176.30	1.00	\$141.04
TOTALS:			209.20	\$42,063.70

5. Costs charged to KeyBank are:

Date	Description	Amount
11/11/14	Pacer Fees (document copies)	\$4.80
2/6/15	Filing Fee – USBC	\$176.00
2/6/15	Filing Fee – USBC	\$15.00
8/25/15	Filing Fee – USBC	\$15.00
	Total Costs:	\$ 210.80

6. As indicated in KeyBank's Proof of Claim [Claim No. 21], KeyBank is a secured
23 creditor in this case, and entitled to recover its attorneys' fees and costs. The basis for
24 KeyBank's secured status arises from two separate security documents: (a) the Deed of Trust
25 encumbering the real property ("Real Property") subject to the Debtor's Motion to Sell [Docket
26

1 No. 252], previously owned by DeLaMMC, LLC, and transferred to the Debtor pre-petition; and,
2 (b) the Security Agreement encumbering personal property previously owned by Valley Rolling
3 Corporation, and transferred to the Debtor pre-petition. The underlying promissory notes from
4 Valley Rolling Corporation (demand line of credit--Loan No. 11001) and DeLaMMC, LLC
5 (commercial real estate loan--Loan No. 1) each provide for payment of KeyBank's attorneys'
6 fees and expenses, including fees and expenses relating to bankruptcy proceedings. At this time,
7 KeyBank seeks only attorneys' fees and expenses attributable to legal services relating to the
8 commercial real estate loan, to be paid from proceeds of the sale of the Real Property, to which
9 KeyBank is entitled under the Deed of Trust. Because of the significant overlap between work
10 related to the Deed of Trust and the Security Agreement, KeyBank could not precisely segregate
11 attorney fees and costs for work between the two agreements. To address this issue, KeyBank is
12 seeking from the sale of the Real Property 80% of the total attorney fees and costs incurred post-
13 petition, as that percentage represents the portion of KeyBank's Proof of Claim associated with
14 the DeLaMMC loan secured by a Deed of Trust on the Real Property.

15 7. SWW has not shared or agreed to share any compensation received or to be
16 received for the services rendered in connection with this case, except with a regular member,
17 partner, associate, or of counsel of the firm.

18 8. A description of the timekeepers' services and expenses is included and
19 incorporated into this Declaration as Exhibit 1.

20 9. Under LBR 2016-1(1)(B), KeyBank requests an additional \$2,500 in attorney fees
21 and costs that it expects to incur addressing Debtor's Motion to Sell and until the Real Property
22 sale closes.

23 10. KeyBank requests a total of \$44,774.53 for expenses that fall within the limits of
24 LBR 2016-1(b).

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1 I hereby declare that the above statements are true to the best of my knowledge and
2 belief, and I understand that they are made for use as evidence in court and is subject to penalty
3 for perjury.

4 Dated this 26th day of October, 2015.

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6 *s/ Craig G. Russillo*
Craig G. Russillo, OSB No. 973875

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TAX ID# IRS-93-1130272

October 21, 2015

SHEILA R. COCHRAN
KEYCORP
KEY TOWER 2ND FLOOR
127 PUBLIC SQUARE
CLEVELAND, OH 44114

Client/Matter #: 027891-198786
Invoice #: *****

Re: Valley Rolling Corporation Inc/DeLaMMC LLC
LOAN AMOUNT: \$2,182,682.05
MATTER #: 15268

FOR LEGAL SERVICES RENDERED

DATE	INDV	HOURS	TASK/ACTIVITY	DESCRIPTION OF SERVICES
09/29/14	AP	.20	L120 /A104	Analysis regarding automatic stay and "collapsed" corporation issue
09/29/14	BBR	1.10	L120 /A102	Research and draft memo to Craig Russillo regarding potential violations of the automatic stay
09/29/14	CGR	.20	L230 /A108	Telephone call with Judge's clerk regarding status of matter and suggested course of action
09/29/14	CGR	.20	L470 /A106	Email to Sheila and Ron regarding intervening security interest on equipment
09/29/14	CGR	.20	L250 /A101	Work on Ron Goss' Pro Hac Vice application
09/29/14	CGR	.30	L110 /A104	Review transfer documents from DeLaMMC and Valley Rolling
09/29/14	CGR	.20	L110 /A107	Email to opposing counsel regarding unsigned deed
09/29/14	CGR	.20	L110 /A107	Email to Ted Troutman regarding signed and recorded deed
09/29/14	CGR	.20	L110 /A104	Review Motion to Employ Ted Troutman and Voluntary Chapter 11 Petition
09/29/14	CGR	.20	L110 /A106	Email to Ron and Sheila regarding application to employ Troutman
09/29/14	CGR	.30	L120 /A104	Analyze whether service of occupants of nonjudicial foreclosure notice would violate automatic stay

TERMS: DUE AND PAYABLE UPON RECEIPT.

AMOUNTS UNPAID MORE THAN 30 DAYS AFTER INVOICING ARE SUBJECT TO A LATE PAYMENT CHARGE OF 9% PER ANNUM. **Exhibit 1**
IOLTA PARTICIPANTS - PROCEEDS SUPPORT PUBLIC INTEREST OBJECTIVES OF THE LAW FOUNDATIONS.
ATTORNEY-CLIENT COMMUNICATION, PRIVILEGED AND CONFIDENTIAL. **Page 1 of 22**



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09/29/14	CGR	.80	L120 /A102	Analyze (1) possible violation of stay for continuing nonjudicial foreclosure notices to tenants, (2) possibility of moving to dismiss BK case for bad-faith filing based on transfer in violation of order, and (3) legitimacy of collapsing entities into principal
09/29/14	CGR	.10	L470 /A106	Email to Sheila and Ron regarding request to opposing counsel for documents related to transfer of assets
09/29/14	CGR	.20	L470 /A107	Email to Ted Troutman (opposing counsel) regarding documents evidencing transfer of assets to Hagenauer
09/29/14	CGR	.70	L120 /A106	Telephone call with Ron Goss and Sheila Cochran regarding various issues related to Hagenauer Chapter 11 filing
09/29/14	CGR	.20	L240 /A107	Email to opposing counsel regarding cash collateral issues
09/29/14	CGR	.20	L110 /A104	Review Hagenauer's Chapter 11 filing
09/29/14	CGR	.20	L110 /A106	Email to Sheila and Ron regarding Hagenauer's BK filing
09/29/14	CGR	.20	L120 /A106	Email to Sheila Cochran regarding instructions to inform third parties to hold off collection efforts in light of BK
09/29/14	CGR	.30	L120 /A101	Work on various action needed to take regarding recent BK filing
09/29/14	DAA	.20	L120 /A105	Strategize with C Russillo regarding analysis of Hagenauer bankruptcy filing
09/29/14	KHA	.20	L110 /A104	Review recorded deed transferring real property and staying foreclosure proceedings
09/29/14	KHA	.30	L110 /A108	Multiple communications with title company re searching for transfer deed
09/29/14	KHA	.80	L110 /A103	Prepare pro hac vice application for Ronald Goss
09/29/14	KHA	.70	L140 /A103	Electronic filings of Special notice request for Dave Anderson and Craig Russillo
09/29/14	KHA	.30	L110 /A108	Communications with sheriff re advising of bankruptcy filing and placing hold on enforcement of order for provisional process
09/30/14	CGR	.20	L470 /A106	Email to Ron and Sheila regarding conclusion that proceeding with serving notice of sale will likely violate the stay
09/30/14	CGR	.20	L110 /A104	Review UCC-1 filed against Valley Rolling to determine priority of KeyBank line
09/30/14	CGR	.20	L250 /A106	Review motion to employ accountant and email to Ron Goss regarding possible response
10/02/14	CGR	.20	L240 /A106	Email to Ron Goss regarding Cash Collateral Motion
10/02/14	CGR	.20	L240 /A107	Email to Sue Pickgrove of the SBA regarding dismissal of foreclosure claims
10/02/14	CGR	.20	L230 /A106	Email to Ron and Sheila a 341 hearing

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10/02/14	CGR	.40	L240 /A106	Telephone call with Ron Goss regarding cash collateral order
10/02/14	CGR	.20	L240 /A103	Finalize and file request to appear by phone for cash collateral hearing
10/02/14	CGR	.30	L240 /A106	Telephone call with Ron Goss regarding terms of stipulated order
10/02/14	KHA	.40	L110 /A103	Correspondence to court requesting appearance at 10/6 hearing via telephone
10/02/14	KHA	.50	L110 /A104	Electronically file request for telephone appearance
10/02/14	KHA	.20	L110 /A108	Telephone call to court re advising of filing request within 3 days of hearing
10/03/14	CGR	.30	L210 /A104	Review Order for Use of Cash Collateral and confirm it conforms to local rules
10/03/14	CGR	.20	L210 /A105	Work with Karen Harris regarding filing of Stipulated Order for Use of Cash Collateral
10/03/14	CGR	.20	L210 /A107	Email to opposing counsel's clerk regarding execution of stipulated order for use of cash collateral
10/03/14	CGR	.20	L210 /A107	Email to Lisette regarding Stipulated Order for Use of Cash Collateral
10/03/14	CGR	.20	L470 /A107	Email to opposing counsel office regarding executed stipulation for filing
10/03/14	CGR	.20	L210 /A106	Email to Sheila regarding Cash Collateral Order
10/03/14	KHA	1.00	L110 /A103	Revise and finalize Stipulated Order re Cash Collateral
10/03/14	KHA	.50	L110 /A104	Electronically upload stipulated order
10/03/14	KHA	.20	L110 /A108	Telephone call to court re advising of uploading of order for Monday's hearing
10/06/14	CGR	.20	L210 /A107	Email to Ted Troutman with revised Cash Collateral Order
10/06/14	CGR	.20	L210 /A103	Additional changes to Cash Collateral Order based upon review of Stipulation for Use of Cash Collateral with IRS
10/06/14	CGR	.20	L210 /A107	Email to Bob Carlton regarding bank's decision to give Hagenauer 10 days' notice
10/06/14	CGR	.60	L450 /A109	Prepare and attend (by phone) hearing on use of cash collateral
10/06/14	CGR	.20	L210 /A103	Revise Notice of Intent to Default D. Hagenauer
10/06/14	CGR	.20	L210 /A107	Telephone call with Ted Troutman regarding changes to Cash Collateral Order
10/06/14	CGR	.80	L210 /A103	Work on revision to Cash Collateral Order per judge's comments at hearing
10/06/14	CGR	.20	L210 /A107	Email to revised Cash Collateral Order to Ted Troutman
10/06/14	CGR	.20	L470 /A106	Email to Sheila Cochran regarding borrower's concerns about RCC's notices
10/06/14	CGR	.30	L430 /A107	Email to counsel for Cascadia Metals regarding cash collateral hearing and stipulation between KeyBank and borrower for use of cash collateral

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10/06/14	CGR	.20	L140 /A104	Review file to determine if defendant Hagenauer had provided a notice of intent to defend the lawsuit / review Forbearance Agreement to determine if it contains any notice of intent to defend
10/06/14	CGR	.30	L240 /A106	Email to Sheila Cochran regarding strategy to deal with defendant Hagenauer and default
10/06/14	CGR	.20	L120 /A106	Email to Sheila Cochran regarding decision to give Dennis Hagenauer a new notice
10/06/14	CGR	.30	L210 /A103	Work on ORCP 69 Notice of Default to defendant Dennis Hagenauer
10/06/14	DAA	1.00	L120 /A104	Analyze effect of borrower assigning equipment from entity to herself and then filing bankruptcy
10/06/14	KHA	.70	L110 /A104	Review matter to prepare default documents
10/07/14	CGR	.30	L210 /A103	Review cash collateral order after debtor's counsel made changes
10/07/14	CGR	.20	L210 /A107	Email to debtor's counsel regarding proposed changes to cash collateral order
10/07/14	DAA	2.60	L120 /A104	Analyze arguments for dismissing or avoiding assignment of collateral to debtor
10/08/14	CGR	.40	L120 /A106	Telephone call with Ron Goss regarding update on BK case and litigation against Dennis Hagenauer
10/08/14	CGR	.20	L210 /A104	Review proposed changes to Cash Collateral Order from Cascadia Metals
10/08/14	CGR	.20	L210 /A107	Email to debtor's counsel and Cascadia Metal counsel regarding cash collateral order
10/08/14	CGR	.20	L210 /A104	Review final cash collateral order provided by debtor's counsel
10/08/14	CGR	.20	L210 /A107	Email to debtor's counsel approving of final version of cash collateral order
10/08/14	CGR	.20	L210 /A107	Email to opposing counsel (Cascadia Metals) regarding cash collateral order
10/09/14	CGR	.20	L470 /A107	Email to debtor's counsel and Cascadia Metals' counsel regarding ability to exceed budgeted amount for purchase of materials
10/09/14	CGR	.20	L470 /A106	Email to Sheila Cochran regarding Debtor's interpretation of cash collateral order
10/13/14	CGR	.20	L110 /A104	Review Debtor's schedules and other BK documents recently filed
10/13/14	CGR	.20	L110 /A106	Email to Sheila Cochran with recently filed BK documents and comments
10/13/14	CGR	.20	L470 /A106	Email to Sheila regarding amounts received by KeyBank on AR collection efforts
10/13/14	CGR	.20	L470 /A107	Email to opposing counsel regarding AR collection efforts by KeyBank pre-petition
10/14/14	CGR	.30	L220 /A106	Two emails to Sheila Cochran regarding what to do with checks that RCC recovered as part of direct-notify attempts

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10/14/14	CGR	.20	L220 /A107	Email to Debtor's counsel regarding Debtor intention with respect to checks recovered by RCC pre-petition
10/14/14	CGR	.20	L470 /A106	Email to Sheila and Ron regarding possible disposition of checks received from AR direct notify efforts.
10/14/14	CGR	.30	L470 /A106	Telephone call with Ron Goss regarding how to deal with funds received from direct notification efforts
10/20/14	CGR	.10	L470 /A104	Review communication from JP Morgan regarding Notice of Provisional Process
10/20/14	CGR	.20	L470 /A106	Email to Sheila and Ron regarding communication from JP Morgan and suggested course of action to deal with same
10/20/14	CGR	.30	L120 /A106	Telephone call with Ron Goss regarding strategy to deal with cash collateral, 341 hearing, 2004 exam, and default judgment
10/20/14	CGR	.20	L210 /A106	Email to Ron Goss with pro hac vice application
10/22/14	CGR	.10	L110 /A104	Review budget from Hagenauer claiming amounts due as "employee"
10/22/14	CGR	.20	L110 /A106	Email to Ron Goss regarding whether to point out that Valley Rolling is not longer separate entity
10/22/14	CGR	.20	L160 /A106	Email to Sheila Cochran regarding default interest accrual per diem to provide escrow based on limitation in third party lending agreement
10/22/14	CGR	.20	L160 /A108	Email to escrow with default interest per diem based on third party lending agreement
10/22/14	CGR	.20	L240 /A106	Email to Sheila regarding payoff needed for default judgment against Dennis Hagenauer
10/22/14	CGR	.30	L240 /A103	Revise Motion for Order of Default, Order of Default, and Declaration in support of same
10/23/14	CGR	.20	L470 /A106	Telephone call with Ron Goss regarding default judgment and debtor's budget
10/23/14	CGR	.20	L210 /A106	Email to Sheila Cochran regarding payoff needed for default judgment
10/24/14	CGR	.20	L210 /A106	Email to Sheila Cochran regarding declaration
10/24/14	CGR	.20	L210 /A106	Email to Ron Goss regarding whether we should default Valley Rolling in addition to Dennis Hagenauer
10/24/14	CGR	1.20	L210 /A103	Draft Declaration for Sheila Cochran in support of motion for limited judgment
10/24/14	CGR	.20	L210 /A106	Email to Sheila Cochran regarding declaration
10/24/14	CGR	1.30	L240 /A103	Work on (A) Motion for Limited Judgment against Valley Rolling and D. Hagenauer, and (B) Judgment
10/26/14	DAA	1.20	L240 /A103	Draft default documents for default against D. Hagenauer and Valley Rolling

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10/27/14	CGR	.20	L110 /A106	Email to Sheila Cochran regarding apparent failure of borrower to pay real property taxes
10/27/14	DAA	.20	L120 /A105	Email correspondence with C Russillo, L Schauer, and L Bailey regarding cost bill
10/28/14	DAA	1.30	L240 /A103	Finalize default documents
11/03/14	CGR	.20	L210 /A106	Email to Sheila and Ron regarding status of default judgment
11/03/14	CGR	.20	L210 /A105	Work with Dave Anderson regarding status of default judgment and confirmation of same through OJIN
11/03/14	CGR	.20	L210 /A106	Email to Ron Goss regarding timing for entry of default judgment
11/03/14	DAA	.30	L240 /A104	Monitor court's OJIN report regarding status of judgment
11/06/14	CGR	.20	L210 /A106	Email to Ron Goss regarding issues with debtor's motion for final order for use of cash collateral
11/06/14	CGR	.30	L120 /A106	Telephone call with Ron Goss regarding motion for use of cash collateral
11/06/14	KHA	.20	L110 /A108	Communications with appraiser confirming ownership of property
11/06/14	KHA	.80	L110 /A103	Prepare appraisal engagement letter
11/07/14	CGR	.30	L210 /A106	Telephone call with Ron Goss regarding filing objection to motion for use of cash collateral
11/07/14	CGR	1.00	L210 /A103	Review, revise, finalize and gather exhibits for objection to use of cash collateral and file same
11/10/14	CGR	.30	L210 /A106	Telephone call with Ron Goss regarding KeyBank's objection to cash collateral
11/10/14	CGR	.20	L110 /A106	Email to Ron Goss regarding 2004 exam of Hagenauer
11/10/14	CGR	.20	L120 /A106	Email to Ron Goss regarding attendance at cash collateral hearing
11/11/14	CGR	.20	L120 /A106	Email with Ron Goss regarding cash collateral hearing
11/11/14	KHA	.20	L110 /A104	Receive provisional process package back from sheriff
11/12/14	CGR	.20	L210 /A104	Review Unsecured Creditors' Committee's response to debtor's motion for relief
11/12/14	CGR	.20	L210 /A106	Email to Ron Goss regarding stipulated order for use of cash collateral and inclusion of Committee's concerns into order
11/12/14	CGR	.30	L210 /A106	Telephone call with Ron Goss regarding creditor committee's objection to cash collateral motion
11/13/14	CGR	.20	L120 /A106	Email with Ron Goss regarding changes to cash collateral order
11/13/14	CGR	.30	L210 /A107	Telephone call with Phil Muir (opposing counsel) regarding cash collateral order and inclusion of budget

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Exhibit 1

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11/13/14	CGR	.20	L210 /A107	Email to US Trustee regarding inclusion of new budget in Stipulated Order for Cash Collateral
11/13/14	CGR	.20	L210 /A107	Email to US Trustee regarding filing of revised budget
11/13/14	CGR	.20	L210 /A106	Telephone call with Ron Goss regarding changes to the stipulated cash collateral order requested by unsecured creditors' committee
11/13/14	CGR	.20	L470 /A106	Email to Ron and Sheila regarding judgment against Hagenauer and Valley Rolling and suggested course of action
11/13/14	CGR	.20	L210 /A103	Review and revise cash collateral order
11/13/14	CGR	.20	L210 /A107	Email to opposing counsel regarding final Cash Collateral Order
11/13/14	CGR	.20	L210 /A106	Email to Ron Goss regarding budget to be attached to Cash Collateral Order
11/13/14	CGR	.30	L210 /A106	Telephone call with Ron Goss regarding inclusion of budget on Cash Collateral order
11/13/14	KHA	.70	L110 /A103	Revise and format stipulated order
11/14/14	CGR	.30	L210 /A106	Telephone call with Ron Goss regarding cash collateral hearing
11/14/14	CGR	.80	L530 /A101	Prepare for and participate in hearing on Interim Use of Cash Collateral
11/14/14	CGR	.30	L210 /A106	Telephone call with Ron Goss regarding results of hearing on interim use of cash collateral
11/14/14	CGR	.30	L210 /A103	Revise terms of Interim Order for Use of Cash Collateral per Judge's request
11/14/14	CGR	.20	L210 /A107	Email to opposing counsel regarding revised order for use of cash collateral
11/14/14	KHA	.90	L110 /A103	Revise, finalize and upload stipulated order for cash collateral
11/18/14	CGR	.40	L120 /A106	Call with Ron Goss regarding possible garnishment of Dennis Hagenauer and ramifications of same
11/18/14	CGR	.20	L470 /A101	Work on writ of garnishment for Laura Hagenauer
11/18/14	KHA	.40	L110 /A104	Calculate balance due under judgment
11/19/14	CGR	.20	L470 /A105	Work with Karen Harris regarding garnishment of Debtor
11/19/14	CGR	.20	L470 /A104	Review and analyze whether garnishment to Debtor for employee's wages violates the automatic stay
11/19/14	DAA	3.10	L240 /A104	Analyze effect of automatic stay on garnishment of wages due to debtor's employee
11/19/14	KHA	1.30	L110 /A106	Prepare garnishment package
11/19/14	KHA	.30	L110 /A105	Conference with D. Anderson re serving garnishment on garnishee in bankruptcy
11/19/14	KHA	.20	L110 /A106	Forward appraisal to client for review
11/20/14	CGR	.20	L470 /A105	Work with Karen Harris and Dave Anderson regarding status of writ of garnishment to debtor

TERMS: DUE AND PAYABLE UPON RECEIPT.

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11/20/14	CGR	.20	L470 /A106	Email with Ron Goss regarding status of garnishment against Debtor
11/20/14	DAA	.20	L240 /A104	Email correspondence to / from C Russillo regarding status of garnishment
12/01/14	CGR	.20	L120 /A106	Email to Ron Goss regarding Final Hearing on use of Cash Collateral and Motion to Dismiss or Convert
12/01/14	CGR	.30	L120 /A106	Telephone call with Ron Goss regarding 2004 exam and motion to dismiss case
12/04/14	CGR	.20	L120 /A106	Email to Ron Goss regarding response to Debtor's motion for final use of cash collateral
12/04/14	CGR	.20	L120 /A106	Email to Ron Goss regarding response to motion for use of cash collateral and timing of 2004 hearing
12/04/14	CGR	.20	L350 /A104	Work on pleadings for 2004 exam of Hagenauer
12/04/14	CGR	.20	L350 /A106	Email to Ron Goss regarding 2004 exam pleadings
12/04/14	CGR	.20	L120 /A106	Telephone call with Ron Goss regarding documents necessary to produce before 2004 hearing
12/04/14	CGR	.20	L210 /A106	Email to Ron Goss regarding process for pro hac application
12/04/14	CGR	.20	L350 /A106	Telephone call with Ron Goss regarding changes to 2004 exam order regarding production of documents
12/04/14	CGR	.20	L350 /A103	Revise 2004 Order to provide for production of documents before examination
12/04/14	CGR	.20	L350 /A106	Email to Ron Goss regarding proposed changes to 2004 Order
12/04/14	CGR	.20	L210 /A106	Telephone call with Ron Goss regarding pro hac vice application
12/04/14	CGR	.20	L210 /A107	Email to Ted Troutman with Stipulated Motion and Order for 2004 Exam
12/04/14	CGR	.20	L210 /A107	Email to Tara Schleichter regarding Motion and Order for 2004 exam
12/04/14	KHA	.20	L110 /A104	Obtain updated service list from court for motion and order for 2004 exam
12/04/14	KHA	.60	L110 /A104	Finalize and upload pro hac vice application and order
12/04/14	KHA	.70	L110 /A103	Revise and format motion and stipulated order for 2004 exam
12/05/14	CGR	.20	L350 /A107	Email to opposing counsel regarding signed stipulation for 2004 exam and intent to file with court
12/05/14	CGR	.30	L120 /A106	Email to Ron Goss in response to several questions regarding collection efforts
12/05/14	KHA	.60	L110 /A103	UCC searches to obtain clean copies of UCC filings
12/05/14	KHA	.20	L110 /A104	Confirm deadline to respond to writ of garnishment

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12/05/14	KHA	.30	L110 /A103	Finalize and upload stipulated order for 2004 exam
12/05/14	KHA	.50	L110 /A103	Finalize and electronically file motion for 2004 exam
12/08/14	CGR	.30	L470 /A106	Email to Ron Goss regarding failure by debtor to respond to writ of garnishment and suggested course of action
12/08/14	CGR	.30	L240 /A106	Work with Ron Goss on response to Motion for Use of Cash Collateral and possible collection efforts against D. Hagenauer
12/09/14	CGR	.20	L410 /A106	Email to Ron Goss regarding 2004 examination of debtor
12/09/14	CGR	.20	L410 /A107	Email to Cascadia Metals counsel regarding 2004 exam
12/09/14	CGR	.30	L240 /A106	Telephone call with Ron Goss regarding filing objection to motion for use of cash collateral
12/09/14	CGR	.20	L350 /A111	Brief review of opposition to motion for relief from stay
12/09/14	CGR	.10	L350 /A111	Gather and arrange exhibits
12/09/14	CGR	.10	L350 /A111	Finalize and file relief from stay
12/09/14	KHA	1.40	L110 /A103	Finalize and electronically file objection to debtor's motion for use of cash collateral
12/10/14	KHA	.10	L110 /A106	Request from KeyBank to order hard copies of appraisals
12/10/14	KHA	.20	L110 /A108	Order hard copies of appraisal
12/15/14	CGR	.20	L110 /A106	Email to Ron Goss regarding 2004 exam and failure by debtor to provide necessary documents
12/19/14	CGR	.20	L120 /A106	Email to Ron Goss regarding 2004 exam and deadline to object to dischargeability of claim
12/22/14	CGR	1.10	L120 /A106	Telephone call with Ron Goss regarding 2004 exam and stipulated order for continued use of cash collateral
12/29/14	CGR	.20	L240 /A106	Email to Ron Goss regarding hearing on motion for use of cash collateral
12/29/14	CGR	.30	L120 /A101	Telephone conference with Ron Goss regarding motion for use of cash collateral
01/05/15	KHA	.60	L110 /A103	Prepare and electronically file request to appear at hearing via telephone
01/05/15	KHA	.20	L110 /A108	Communications with Court re filing of request to appear at hearing via telephone
01/06/15	CGR	.20	L120 /A106	Email to Ron Goss regarding cash collateral hearing and filing of stipulation
01/06/15	CGR	.20	L210 /A106	Email to Ron Goss regarding filing of Stipulated Motion for Cash Collateral
01/06/15	CGR	.20	L210 /A105	Work with Karen Harris regarding formatting of Third Cash Collateral Order
01/06/15	CGR	.20	L210 /A106	Email to Ron Goss regarding filing of Third Cash Collateral Order

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01/06/15	CGR	.20	L210 /A106	Telephone call with Ron Goss regarding changes to the Third Cash Collateral Order and filing of same
01/06/15	CGR	.20	L210 /A103	Review and revise Third Cash Collateral Order
01/06/15	KHA	.40	L110 /A103	Review and begin re-formatting stipulated order
01/07/15	CGR	.20	L210 /A106	Email to Ron Goss regarding changes to and finalization of Third Order for Cash Collateral
01/07/15	CGR	.20	L210 /A103	Revise cash collateral order and budget per Ron Goss' instructions
01/07/15	CGR	.30	L210 /A103	Work with Karen on changes to Cash Collateral Order and Budget
01/07/15	CGR	.20	L210 /A106	Email to Ron Goss confirming filing of Cash Collateral Order
01/07/15	CGR	.30	L120 /A106	Telephone call with Ron Goss regarding Cash Collateral Order and Absolute Priority Rule
01/07/15	KHA	1.00	L120 /A103	Finalize and electronically file stipulated order re cash collateral
01/07/15	KHA	.20	L120 /A108	Communications with court re uploading of stipulated order
01/12/15	CGR	.20	L470 /A106	Email to Ron Goss and Sheila Cochran regarding funds received from garnishment
01/22/15	CGR	.30	L120 /A106	Telephone call with Ron Goss regarding possibly filing plan of liquidation
01/22/15	CGR	.20	L110 /A104	Review comparable chapter 11 for liquidation plan and disclosure statement
01/22/15	CGR	.20	L120 /A106	Email to Ron Goss regarding sample liquidation plan and disclosure statement
01/26/15	CGR	.40	L120 /A106	Telephone call with Ron Goss regarding strategy with regard to filing plan and sale of residence
01/26/15	CGR	.20	L120 /A106	Email to Ron Goss with title report from foreclosure
01/27/15	CGR	.20	L330 /A106	Email to Sheila Cochran regarding lien information needed for 2004 exam of Hagenauer
01/28/15	CGR	.30	L120 /A106	Telephone call with Ron Goss regarding motion to convert case and filing of liquidation plan
02/04/15	CGR	.50	L120 /A106	Telephone call with Ron Goss regarding motion to convert, motion for relief, and notice to creditors
02/04/15	CGR	.20	L120 /A106	Email to Ron Goss regarding motion to convert
02/06/15	CGR	.50	L240 /A103	Work on finalizing various motion for filing
02/06/15	CGR	.20	L240 /A106	Email to Sheila Cochran regarding declaration in support of motion for relief
02/06/15	CGR	.20	L240 /A106	Email to Ron Goss regarding filing of Objection to Use of Cash Collateral
02/06/15	CGR	.30	L240 /A103	Review and finalize for filing objection for use of cash collateral
02/06/15	CGR	.20	L240 /A106	Email to Ron Goss regarding letter to judge regarding March 3 hearing of motions

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02/06/15	CGR	.30	L240 /A108	Letter to Judge Alley requesting recently filed motions be heard on March 3
02/06/15	CGR	.30	L210 /A106	Emails to Ron and Sheila regarding motions for relief, conversion, and setting bar date
02/06/15	CGR	.30	L240 /A103	Work on revisions to motion for relief
02/06/15	CGR	.30	L240 /A106	Telephone call with Ron Goss regarding motions to file for March 3 hearing
02/06/15	KHA	4.40	L110 /A103	Revise, finalize and electronically file the following documents: Objection to Motion for Cash Collateral Motion to Convert Declaration in Support of Motion to Convert with Exhibits A-U Notice and Motion for Relief from Stay Declaration in Support of Motion for Relief with Exhibits Motion to Set Bar Date Correspondence to Court requesting specific hearing date
02/06/15	KHA	.40	L110 /A108	Multiple communications with court re scheduling motions for scheduled hearing
02/09/15	CGR	.20	L470 /A106	Email to Ron Goss regarding garnished funds
02/09/15	CGR	.20	L470 /A106	Email to Ron and Sheila regarding garnished funds
02/09/15	CGR	.20	L530 /A106	Email to Ron Goss regarding attendance at hearing on Motion to Convert
02/10/15	CGR	.20	L210 /A105	Work with Karen Harris regarding filing of response to Cred. Committee motion
02/10/15	CGR	.20	L470 /A106	Letter to Cindy Crowther regarding garnished funds
02/10/15	CGR	.50	L240 /A106	Telephone call with Ron Goss regarding various motions to be heard on March 3
02/10/15	CGR	.20	L210 /A106	Email to Ron Goss regarding review and filing of KB's response to motion for authority to pursue avoidance actions
02/10/15	CGR	.30	L210 /A104	Review Response to Creditor's Motion for Authority to Pursue Preference Claims
02/10/15	KHA	.70	L110 /A103	Complete mailings of notice of hearing to all creditors on matrix
02/10/15	KHA	.90	L110 /A103	Telephone communications with clerk re serving notices of hearings
02/10/15	KHA	1.50	L110 /A103	Finalize and electronically file Response to Committee's Motion (with exhibits)
02/12/15	CGR	.20	L240 /A104	Review and approve COS for Motion to Convert Case
02/12/15	KHA	.80	L110 /A103	Prepare and electronically file Certificate of Service of Notice of Hearing and supporting documents
02/13/15	CGR	.20	L470 /A108	Telephone call with Marc Nelson oil regarding 502(b) (9) claim
02/17/15	CGR	.20	L470 /A105	Work with Karen Harris regarding status of foreclosure sale of Valley Rolling property

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02/17/15	CGR	.20	L470 /A105	Work with Karen Harris regarding postponement of foreclosure sale
02/17/15	DJC	.20	L140 /A108	Telephone call with representative from Gorilla Capital regarding bankruptcy and postponed foreclosure
02/18/15	CGR	.30	L120 /A106	Telephone call with Ron Goss regarding exhibits for hearing on Motion to Convert
02/18/15	CGR	.20	L240 /A105	Work with Karen Harris regarding judge's preference for hearing exhibits
02/23/15	CGR	.30	L210 /A104	Review Objections to Motion for Relief and Motion to Convert filed by Debtor and Unsecured Creditors' Committee
02/23/15	CGR	.20	L210 /A104	Review local rules regarding timeframe for filing replies to objections
02/23/15	CGR	.20	L210 /A106	Email to Ron Goss regarding assistance with and logistics of replies to recently filed objections to KeyBank motions
02/23/15	CGR	.20	L210 /A106	Email to Sheila Cochran regarding objection to Motion to Convert
02/23/15	CGR	.30	L120 /A106	Telephone call with Ron Goss regarding strategy for dealing with objections to motions
02/23/15	CGR	.20	L120 /A106	Email with Ron Goss regarding documents needed for hearing on Motion to Convert / Motion for Relief from Stay
02/23/15	CGR	.20	L120 /A105	Work with Karen Harris regarding hearing exhibits establishing liens
02/23/15	CGR	.20	L250 /A106	Email to Ron Goss regarding exhibits
02/23/15	CGR	.20	L250 /A101	Work on exhibit list for March 3 hearings
02/23/15	KHA	.60	L110 /A104	Obtain copies of recorded documents for Ron Goss
02/23/15	KHA	.40	L110 /A104	Confirm balance due on outstanding real property taxes
02/24/15	CGR	.20	L160 /A106	Email to Ron Goss regarding settlement conference and attendance of same
02/24/15	CGR	.40	L250 /A106	Telephone call with Ron Goss regarding valuation issues and possible interest rates for loan
02/24/15	CGR	.20	L250 /A105	Work with Karen Harris regarding exhibits and amendment of proof of claim
02/24/15	CGR	.20	L250 /A105	Work with Karen Harris regarding exhibits necessary for March 3 hearing
02/24/15	CGR	.20	L250 /A106	Email to Ron Goss with Valley Rolling security agreements and UCC filings
02/24/15	CGR	.30	L250 /A101	Work on UCC exhibits for hearing
02/24/15	CGR	.50	L250 /A106	Telephone call with Ron Goss regarding various issues related to March 3 hearings
02/24/15	CGR	.40	L250 /A101	Review and revise Declaration of Sheila Cochran in support of Motion for Relief
02/24/15	CGR	.30	L250 /A106	Email to Ron and Sheila with revised subpoena
02/24/15	KHA	.50	L110 /A104	Create chart of all UCC filings

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02/24/15	KHA	.80	L110 /A103	Conference call with client re analysis of KeyBank claim
02/24/15	KHA	1.80	L110 /A103	Begin identifying and marking exhibits for 3/3 hearing
02/25/15	CGR	.20	L250 /A106	Email to Ron Goss regarding UCC exhibit
02/25/15	CGR	.20	L250 /A106	Email to Ron Goss regarding filing of replies
02/25/15	CGR	.30	L250 /A106	Telephone call with Ron Goss regarding hearing exhibits and reply motions
02/25/15	CGR	.20	L250 /A101	Work with Karen Harris on hearing exhibits
02/25/15	CGR	.80	L240 /A103	Review and revise Reply in support of Motion for Relief
02/25/15	CGR	.30	L240 /A103	Additional edits to Reply in Support of Motion for Relief
02/25/15	CGR	.20	L250 /A106	Email to Ron Goss regarding deadline for filing replies to Motion to Convert and Motion for Relief
02/25/15	CGR	.20	L250 /A103	Work on UCC exhibit
02/25/15	CGR	.20	L240 /A106	Telephone call with Ron Goss regarding reply to Motion to Convert
02/25/15	CGR	.30	L240 /A103	Revisions to Reply to Motion to Convert
02/25/15	CGR	.30	L240 /A106	Telephone call with Ron Goss regarding debtor's motion to extend exclusivity period
02/25/15	KHA	1.40	L110 /A103	Finalize and electronically file reply to objection to motion to convert
02/25/15	KHA	1.40	L110 /A103	Finalize and electronically file reply to objection to motion for relief
02/25/15	KHA	.40	L110 /A103	Prepare redacted exhibit of KeyBank UCC filings and summary
02/26/15	CGR	.30	L240 /A103	Work on objection to Motion to Extend Exclusivity
02/26/15	CGR	.40	L240 /A106	Telephone call with Ron Goss regarding (1) stopping work on objection to motion to extend exclusivity, and (2) possible deal done through Motion for Relief as a settlement
02/26/15	CGR	.20	L240 /A106	Work with Ron Goss on hearing prepare for and exhibits
02/26/15	CGR	.30	L160 /A106	Telephone call with Ron Goss regarding terms of settlement, appearance at hearing by phone, and proposed order
02/26/15	CGR	.20	L240 /A101	Continue working on exhibits for hearing
02/26/15	CGR	.20	L240 /A106	Email to Ron Goss regarding hearing exhibits
02/26/15	KHA	1.30	L110 /A103	Identify and mark exhibits for 3/3 hearing
02/26/15	KHA	.50	L110 /A103	Prepare list of exhibits still need from Ron Goss
02/26/15	KHA	.50	L110 /A103	Draft correspondence to court re appearing at 3/3 via telephone
02/26/15	KHA	.20	L110 /A108	Telephone communication with court clerk re requesting telephone appearance at 3/3 hearing and possible resolution of KeyBank's issues
02/27/15	KHA	.70	L110 /A103	Format Stipulated Order on Various Motions

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02/27/15	KHA	.20	L110 /A106	Communications with Ron Goss re 3/3 hearing, stipulated order and possible resolution of KeyBank issues
03/02/15	CGR	.30	L250 /A106	Telephone call with Ron Goss regarding proposed order on Motion for Relief
03/03/15	CGR	.20	L250 /A106	Email to Ron Goss regarding edits to Stipulated Order for Relief from Stay
03/03/15	CGR	.10	L250 /A105	Work with Karen Harris regarding revisions to Stipulated Order for Relief from Stay
03/03/15	CGR	.20	L250 /A106	Email to Ron Goss regarding execution and uploading of Stipulated Order
03/03/15	CGR	.20	L120 /A106	Telephone call with Ron Goss regarding cash collateral hearing and strategy for moving forward
03/03/15	CGR	.20	L250 /A106	Email to Ron Goss regarding proposed changes to Order suggested by Unsecured Creditors' Committee
03/03/15	CGR	.20	L250 /A106	Telephone call with Ron Goss regarding changes to Stipulated Order for Relief
03/03/15	CGR	.20	L250 /A103	Revise Stipulated Order
03/03/15	CGR	.20	L250 /A108	Email revised Stipulated Order to counsel
03/03/15	CGR	.20	L250 /A108	Email to Ron Goss regarding receipt of signed copies of Stipulation and uploading of Order
03/03/15	CGR	.30	L530 /A101	Participate in hearing on Motion for Relief
03/03/15	KHA	.70	L110 /A103	Revise stipulated order on multiple motions
03/03/15	KHA	.80	L110 /A103	Finalize and electronically file stipulated order
03/03/15	KHA	.60	L110 /A108	Multiple communications with court re stipulated order dealing with multiple issues and ECF system will not allow that many events to link together
03/04/15	CGR	.20	L250 /A105	Work with Karen Harris regarding potential issues with Stipulated Order
03/04/15	KHA	.30	L110 /A108	Communications with court clerk processing stipulated order as is even though it deals with multiple issues
03/17/15	CGR	.20	L120 /A106	Email to Ron Goss regarding Stipulated Order for Cash Collateral
05/06/15	CGR	.30	L120 /A106	Telephone call with Ron Goss regarding objection to disclosure statement
05/06/15	CGR	.30	L210 /A104	Review and revise Disclosure Statement and ready for filing
05/06/15	CGR	.20	L210 /A103	Work on Objection to Disclosure Statement
05/07/15	KHA	1.00	L110 /A103	Finalize and electronically file objection to amended disclosure statement
05/18/15	CGR	.20	L120 /A106	Email to Ron Goss regarding hearing on Disclosure Statement
06/03/15	CGR	.20	L120 /A106	Email to Ron Goss regarding SBA's request for modification to plan / review same

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06/15/15	KHA	.80	L110 /A103	Prepare and electronically file request to appear via telephone at June 30, 2015 hearing
06/30/15	CGR	.30	L120 /A106	Telephone call with Ron Goss regarding status of Disclosure Statement
08/03/15	CGR	.40	L120 /A106	Telephone call with Ron Goss regarding show cause hearing
08/03/15	KHA	.30	L110 /A106	Communications with client re appraiser's request
08/11/15	CGR	.20	L120 /A106	Email from / to Ron Goss regarding strategy call for hearing
08/13/15	CGR	.40	L120 /A106	Telephone call with Ron Goss regarding strategy for hearing on disclosure statement
08/16/15	CGR	.20	L240 /A104	Review renewed Motion to Dismiss/Convert and supporting documents.
08/16/15	CGR	.20	L240 /A106	Emails from and to Ron Goss regarding renewed Motion to dismiss or convert.
08/17/15	CGR	1.00	L120 /A106	Telephone call with Ron and Sheila regarding Cochran declaration and prepare for hearing
08/17/15	CGR	.20	L120 /A106	Email to Ron Goss regarding information needed to prepare for hearing
08/17/15	CGR	.20	L210 /A106	Email to Ron Goss with Objection to Disclosure Statement and Motion to Convert and Declaration of Cochran
08/19/15	CGR	.20	L120 /A106	Email to Ron Goss and Karen Harris regarding filing of objection to disclosure statement and renewed motion to convert
08/19/15	EED	1.30	L210 /A110	Research and prepare debtor-in-possession bank statements, tax lien notices, tax returns, and multiple proofs of claim as potential attachments to hearing exhibits
08/19/15	EED	1.40	L210 /A110	Review financial amounts owed on DeLaMMC Building liens and cross-reference with proofs of claim and examine projection payout on disclosure statement for accuracy
08/19/15	EED	1.80	L210 /A101	Review Sheila Cochran's declaration in support of KeyBank's objection to Second Amended Disclosure Statement and start preparing exhibits for filing
08/19/15	KHA	2.10	L110 /A106	Work on objection to disclosure statement and motion to convert and identify and mark exhibits
08/19/15	KHA	.30	L110 /A107	Telephone conference with Judicial Assistant
08/19/15	KHA	.30	L110 /A106	Telephone conference with Craig
08/19/15	KHA	1.00	L110 /A106	Extended telephone call with Ron Goss re objection to 2nd amended disclosure statement and motion to convert
08/20/15	CGR	.50	L240 /A103	Work on Motion to Convert/Dismiss and Objection to Disclosure Statement

TERMS: DUE AND PAYABLE UPON RECEIPT.

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08/20/15	EED	.70	L120 /A101	Discuss docketing deadlines regarding filing an objection to debtor's motion to extend deadline and devise strategy for exhibit and witness list
08/20/15	EED	2.30	L210 /A101	Continue reviewing Sheila Cochran's declaration in support of KeyBank's objection to Second Amended Disclosure Statement and preparing exhibits for filing
08/20/15	EED	1.90	L210 /A110	Analyze and compare summary DIP bank account balances, tax returns, administrative claims, income from operations, and state and federal tax liens against working copies of objection and memorandum
08/20/15	KHA	2.00	L110 /A106	Work with Ron Goss on objection and motion to convert
08/21/15	CGR	.20	L240 /A106	Email to Ron Goss regarding additional exhibits for submissions
08/21/15	CGR	.20	L240 /A106	Email to Sheila and Ron regarding disclosure statement hearing
08/21/15	CGR	.30	L120 /A104	Review revised pleadings from Ron Goss on Objection to Disclosure statement
08/21/15	EED	2.10	L210 /A101	Analyze cash collateral report and prepare exhibits corresponding with revised disclosure statement objection
08/21/15	EED	1.70	L210 /A110	Cross-reference 2014-2015 debtor monthly sales, financial reports, and disclosure statement with projected net income and compare figures to US Trustee docket entries
08/21/15	KHA	2.50	L110 /A106	Work with Ron Goss on motion to convert and objection to disclosure statement
08/24/15	CGR	.30	L210 /A104	Work on objection to disclosure statement and show cause hearing
08/24/15	EED	3.20	L210 /A110	Cross reference original and revised copies of Sheila Cochran declaration and objection to second amended disclosure for revised calculations
08/24/15	KHA	5.80	L110 /A103	Review and revise motion to convert and objection with supporting documents
08/24/15	KHA	.30	L110 /A108	Communications with Judicial Assistant re filing and delivery of Judge's copy
08/25/15	CGR	.50	L240 /A104	Work on Objection to Disclosure Statement and show cause hearing
08/25/15	CGR	1.50	L120 /A104	Continue working on renewed Motion to Convert or Dismiss, Objection to Disclosure Statement, Declaration of Sheila Cochran, and Exhibit List
08/25/15	CGR	.30	L240 /A104	Finalize documents for filing and work on logistics for hearing
08/25/15	DJC	2.10	L110 /A103	Assist in revision and review to documents for filing in connection with objection to bankruptcy plan and work on exhibits for same

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Exhibit 1

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08/25/15	EED	1.70	L210 /A110	Analyze and redact all October 2014 - July 2015 bank statements for objection to disclosure statement filing
08/25/15	EED	1.20	L210 /A110	Research and prepare all necessary proofs of claim as exhibits in Sheila Cochran's declaration for objection to disclosure statement filing
08/25/15	EED	2.60	L210 /A110	Cross reference all calculations in memorandum, objection to disclosure statement, and Sheila Cochran's declaration with proof of claims and financial summary exhibits
08/25/15	KHA	1.20	L110 /A103	Electronically file objection and motion to convert with supporting documents
08/25/15	KHA	4.20	L110 /A104	Continue reviewing and revising motion to convert and objection to disclosure statement, preparing exhibits
08/26/15	CGR	.30	L240 /A108	Telephone call with Penske counsel, Andrew Flame, regarding objection to disclosure statement
08/26/15	CGR	.20	L240 /A106	Email to Ron Goss regarding call from Andrew Flame - Penske counsel
08/26/15	CGR	.20	L240 /A106	Telephone call with Andrew Flame regarding 341 hearing transcript
08/26/15	CGR	.20	L240 /A108	Email to Andrew Flame regarding 341 hearing
08/26/15	CGR	.20	L120 /A108	Email to Andrew Flame regarding status of negotiations with debtor
08/26/15	CGR	.20	L120 /A106	Email to Ron Goss regarding discussions with debtor
08/26/15	EED	2.70	L210 /A110	Start preparing exhibit binders for unsecured creditors' committee, trustee, judge, debtor, and various counsel for disclosure statement hearing
08/26/15	EED	3.10	L210 /A110	Assemble and prepare exhibits with attachments and cited sources for disclosure statement hearing
08/26/15	KHA	.30	L110 /A104	Look for 341(a) transcript
08/27/15	CGR	.20	L470 /A108	Email to Ted Troutman regarding source of recent deposit into US Bank account
08/27/15	CGR	.20	L470 /A106	Email to Ron and Sheila regarding recent deposit by debtor into US Bank account
08/27/15	CGR	.20	L110 /A106	Email to Sheila and Ron regarding source of \$88K deposit
08/27/15	EED	2.90	L210 /A110	Revise selective exhibits and continue preparing exhibit binders for unsecured creditors' committee, trustee, judge, debtor, and various counsel for disclosure statement hearing

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08/27/15	KHA	.40	L110 /A103	Communications with Ron Goss and C. Russillo re summary of conversation with Judge Alley's judicial assistant re exhibit notebooks and scheduling of motion to convert
08/28/15	EED	2.60	L210 /A110	Finish revising exhibits and preparing exhibit binders for unsecured creditors' committee, trustee, judge, debtor, and counsel for disclosure statement hearing
08/28/15	KHA	.30	L110 /A104	Review exhibit notebooks
08/31/15	EED	1.30	L210 /A110	Add exhibit and witness list to all exhibit binders and prepare for shipment with attorney to hearing
09/01/15	CGR	.20	L240 /A104	Review Objection to Disclosure Statement filed by Penske
09/01/15	CGR	.20	L240 /A106	Email to Ron Goss and Sheila Cochran regarding Penske objection to Disclosure Statement
09/01/15	CGR	.20	L240 /A104	Review UST's Motion to Convert.
09/01/15	CGR	.20	L240 /A106	Email to Ron Goss and Sheila Cochran regarding UST's Motion to Dismiss.
09/02/15	CGR	.20	L240 /A106	Email to Ron Goss and Sheila Cochran regarding court's decision to set Motion to Dismiss / Convert hearing on same day as objections to disclosure statement
09/02/15	CGR	.30	L240 /A106	Telephone call with Ron Goss regarding exhibits and strategy for hearing on the 14th
09/02/15	CGR	.20	L240 /A108	Email to opposing counsel regarding stipulating to the admission of exhibits
09/02/15	CGR	.20	L240 /A106	Letter to Ron Goss with hearing exhibits
09/02/15	CGR	.30	L440 /A108	Email to opposing counsel with exhibit list and Declaration of Sheila Cochran in support of Request for Stipulation for Admission of Exhibits
09/02/15	CGR	.20	L240 /A106	Email to Ron Goss regarding reset hearing on motion to Dismiss / Convert
09/02/15	CGR	.30	L440 /A108	Telephone call with opposing counsel regarding possibility of stipulating to summary exhibits
09/03/15	CGR	.20	L240 /A106	Email to Ron Goss and Sheila Cochran regarding rescheduled hearing on disclosure statement
09/09/15	CGR	.20	L120 /A106	Email to Ron Goss regarding hearing on Motion to Dismiss or Convert
09/09/15	CGR	.30	L240 /A106	Telephone call with Ron Goss regarding hearing on Motion to Convert and objection to disclosure statement
09/14/15	CGR	.20	L110 /A106	Email to Ron and Sheila regarding low-ball offer on property
09/14/15	CGR	.40	L120 /A106	Telephone call with Ron Goss regarding offer on property and strategy to deal with Show Cause Motion
09/14/15	CGR	.20	L110 /A104	Review offer for purchase of property and review list price information

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09/17/15	CGR	.20	L110 /A104	Review offer to purchase property from Cascadia Metals
09/17/15	CGR	.20	L110 /A106	Email to Ron Goss regarding Cascadia Metals offer to purchase property
09/21/15	CGR	.20	L470 /A105	Work with David Cutler regarding status of foreclosure process
09/21/15	CGR	.70	L120 /A106	Telephone call with Ron Goss regarding strategy for October 1 hearing
09/28/15	CGR	.30	L120 /A106	Telephone call with Ron Goss regarding Motion to Convert hearing
09/29/15	CGR	.50	L120 /A106	Telephone call with Ron Goss and Sheila Cochran regarding Motion to Convert hearing
09/29/15	CGR	.20	L110 /A104	Review recent offer for purchase of property
09/29/15	CGR	.20	L110 /A104	Email to Ron and Sheila regarding sale of property and court decision to move forward with hearing
09/29/15	CGR	.30	L120 /A106	Telephone call with Ron Goss regarding possible settlement of Motion to Convert
09/30/15	CGR	.40	L440 /A101	Work on revised summary exhibits for hearing
09/30/15	CGR	.30	L440 /A106	Telephone call with Ron and Sheila regarding strategy for Motion to Convert
09/30/15	CGR	.30	L440 /A108	Email to Ted Troutman regarding request to consent to summary exhibits
09/30/15	CGR	.20	L440 /A106	Email to Sheila Cochran regarding Declaration and attendance at hearing
09/30/15	CGR	.20	L440 /A106	Email to Ron Goss regarding conversion order
09/30/15	CGR	.20	L440 /A104	Review conversion order
09/30/15	CGR	.20	L440 /A108	Email to conversion order to UST and IRS for review and comment
09/30/15	CGR	.10	L440 /A108	Email to Ted Troutman regarding admissibility of exhibits
09/30/15	CGR	.10	L440 /A106	Email to Sheila Cochran regarding admissibility of summary exhibits
09/30/15	CGR	.30	L440 /A106	Telephone call with Ron Goss regarding show cause hearing
09/30/15	MAI	.40	L250 /A103	Draft Stipulated Order on Conversion
09/30/15	MAI	.20	L250 /A111	Obtain docket information for use in Order
10/01/15	CGR	8.00	L450 /A109	Prepare for and participate in show cause hearing
10/02/15	CGR	.20	L120 /A106	Email to Ron Goss regarding receipt of September payment
10/02/15	CGR	.20	L120 /A105	Work with David Cutler regarding ability to reschedule foreclosure sale
10/02/15	CGR	.20	L120 /A106	Email to Ron Goss regarding ability to continue foreclosure
10/02/15	DJC	.80	L110 /A104	Prepare for continuance of foreclosure process post relief from bankruptcy stay
10/05/15	CGR	.20	L470 /A106	Email to Sheila Cochran regarding payoff of CRE loan

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10/05/15	CGR	.20	L470 /A106	Email to Sheila Cochran regarding allocation of attorney fees
10/05/15	DJC	.10	L110 /A108	Correspondence with title company regarding resuming foreclosure process after relief from stay
10/08/15	CGR	.20	L470 /A111	Prepare payoff amount with inclusion of attorney fees
10/08/15	CGR	.20	L470 /A108	Email to Ted Troutman regarding payoff for CRE loan
10/12/15	CGR	.20	L470 /A108	Email to opposing counsel regarding basis for KeyBank's calculation of amounts owed on CRE loan
10/12/15	CGR	.20	L240 /A106	Email to Ron Goss regarding Response to Motion to Sell filed by Debtor
10/12/15	CGR	.20	L470 /A106	Email to Sheila Cochran regarding request for payoff of Valley Rolling obligation from Debtor's counsel
10/12/15	CGR	.20	L470 /A108	Email to opposing counsel regarding breakdown between default and non-default interest
10/13/15	CGR	.20	L120 /A106	Telephone call with Ron Goss regarding allocation of cash collateral payments
10/13/15	CGR	.20	L470 /A106	Email to Sheila Cochran regarding payoff of Valley Rolling loan
10/13/15	CGR	.20	L470 /A108	Email to Ted Troutman regarding payoff on Valley Rolling loan
10/13/15	CGR	.20	L470 /A105	Work with Maryann Ivey regarding attorney fees and costs incurred as of the petition date
10/13/15	CGR	.20	L470 /A106	Email to Sheila Cochran regarding opposing counsel's request for payment history of Valley Rolling loan
10/13/15	CGR	.20	L470 /A108	Email to opposing counsel regarding payment history on Valley Rolling loan
10/13/15	CGR	.20	L470 /A108	Email to Ted Troutman regarding ETA for loan payment history report on Valley Rolling loan
10/15/15	CGR	.20	L240 /A101	Work on filing response to Debtor's Motion to Sell
10/15/15	CGR	.20	L240 /A106	Email to Ron Goss regarding filing of response to Debtor's Motion to Sell
10/15/15	CGR	.30	L240 /A103	Review and revise Memorandum in Support of Debtor's Motion to Sell
10/15/15	MAI	.40	L250 /A103	Finalize Memorandum in support of Motion for Sale
10/19/15	CGR	.20	L470 /A108	Email to SBA regarding allocation of attorney fees between loans and accrual of default interest
10/19/15	CGR	.20	L110 /A104	Review third party lending agreement to determine limits upon bank to accrue default interest in 1st position

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10/19/15	CGR	.20	L120 /A106	Email to Ron Goss and Sheila Cochran regarding SBA inquiry into default interest and attorney fees, and Third Party Lender Agreement
10/19/15	CGR	.20	L470 /A106	Email to Sheila Cochran regarding closing date for CRE
10/21/15	CGR	.30	L470 /A108	Telephone call with Brandi Sergeant regarding KeyBank fees
10/21/15	CGR	.20	L430 /A106	Email to Ron Goss regarding supplemental proof of claim
10/21/15	CGR	.30	L430 /A104	Review local rule 2016 to confirm process for inclusion of fees in sale of collateral
10/21/15	CGR	.30	L430 /A106	Telephone call with Ron Goss regarding submissions for attorney fees
10/21/15	CGR	1.00	L430 /A103	Work on Declaration in support of request for attorney fees and address various issues related to sale and SBA position

Alex Poust	.20	hrs at	410.00	\$/hr =	\$	82.00
Craig G Russillo	96.30	hrs at	336.20	\$/hr =	\$	32,376.06
Craig G Russillo	.20	hrs at	275.00	\$/hr =	\$	55.00
Brianne L Bridegum	1.10	hrs at	188.60	\$/hr =	\$	207.46
David A Anderson	10.10	hrs at	213.20	\$/hr =	\$	2,153.32
David Cutler	3.20	hrs at	145.00	\$/hr =	\$	464.00
Kai Davies	34.50	hrs at	145.00	\$/hr =	\$	5,002.50
Karen L Harris	62.60	hrs at	192.70	\$/hr =	\$	12,063.02
Mary Ann Ivie	1.00	hrs at	176.30	\$/hr =	\$	176.30

DESCRIPTION OF COSTS

DATE	QUANTITY		
11/11/14	1	Court Access Fees - Check- Pacer Service Center	4.80
02/06/15	1	Filing fees - Check- Key Bank - OR USBC	176.00
02/06/15	1	Filing fees - Check- Key Bank - OR USBC	15.00
08/25/15	1	Filing fees - Check- Key Bank	15.00
SUBTOTAL CURRENT COSTS			\$210.80
TOTAL FEES AND COSTS			\$52,790.46

-TRUST ACCOUNT SUMMARY-----

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TRUST ACCOUNT: PDXTR	Portland IOLTA Trust Account
BALANCE FROM PREVIOUS STATEMENT	.00
PLUS TOTAL DEPOSITS	2777.85
DISBURSEMENT(S) :	
01/22/15 Check to Key Bank; Garnishment	308.65
02/10/15 Check to Key Bank; Garnishment	308.65
02/13/15 Check to Key bank; Disbursement per CGR	308.65
03/11/15 Check to Key Bank; Garnishment disburse CGR	617.30
03/26/15 Check to Key Bank; Disbursement per CGR	308.65
04/09/15 Check to Key Bank; Disbursement per CGR	308.65
04/29/15 Check to Key Bank; Disbursement per CGR	308.65
05/05/15 Check to Key Bank; Disbursement per CGR	308.65
-----	-----
LESS TOTAL DISBURSEMENTS	2777.85 (

CURRENT BALANCE	0.00

FINAL SUMMARY

SUBTOTAL CURRENT COSTS	\$210.80
SUBTOTAL CURRENT FEES	\$52,579.66
TOTAL CURRENT INVOICE	\$52,790.46
TOTAL AMOUNT DUE	\$52,790.46

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CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of October, 2015, I caused to be served the foregoing

3 DECLARATION OF CRAIG G. RUSSILLO PURSUANT TO LOCAL BANKRUPTCY

4 RULE 2016(h)(1)(A)(ii), via ECF on:

- JOHN D ALBERT darlene@shermlaw.com, beth@shermlaw.com
- DAVID ANDERSON danderson@schwabe.com, docket@schwabe.com;gvance@schwabe.com;ecfpdx@schwabe.com
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- US Trustee, Eugene USTPRegion18.EG.ECF@usdoj.gov
- CAROLYN G WADE carolyn.g.wade@doj.state.or.us

17 And via first class mail, postage pre-paid to:

Paul Harrison
Harrison Management Company
POB 80096
Portland, OR 97280-1096

Tiffany Jones
Coldwell Banker Commercial
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Salem, OR 97302

Alex Rhoten
Coldwell Banker Commercial
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Salem, OR 97302

s/ Craig G. Russillo
Craig G. Russillo, OSB No. 973875